

1 UNITED STATES DISTRICT COURT

2 SOUTHERN DISTRICT OF OHIO

3 WESTERN DIVISION

4 - - - - -
5 BARBARA LODER :
6 HILDEBRANDT, :
7 Plaintiff, :
8 vs. : Case No. C-1-02-003
9 HYATT CORPORATION, : (Judge Beckwith)
0 et al., :
1 Defendants. :
0 - - - - -

REC'D APR 25 2002

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2 Videotaped deposition of TYSON W. HELMS, a
3 witness herein, called by the plaintiff for cross-
4 examination, pursuant to the Federal Rules of Civil
5 Procedure, taken before me, Wendy L. Welsh, a
6 Registered Merit Reporter and Notary Public in and
7 for the State of Ohio, at Fisher & Phillips, 420
8 Marquette Building, 140 South Dearborn Street,
9 Chicago, Illinois, on Wednesday, April 17, 2002, at
0 9:28 a.m.

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10:31:59 1 the customers, the market segments and so forth that
 10:32:02 2 made sense under my instruction and came to me with
 10:32:04 3 a recommendation that I felt made sense.

10:32:07 4 Q. Okay. What was your reason for approving
 10:32:10 5 his recommendation?

10:32:11 6 A. I -- I trust Jack's judgment. He has been
 10:32:16 7 very forthright in the past. I gave him specific
 10:32:19 8 direction of three things that I wanted him to
 10:32:22 9 consider. First was to look at cost savings
 10:32:25 10 opportunities, certainly. The second was to try to
 10:32:29 11 do it in a way that would minimize lost production
 10:32:32 12 to the company. And the third was to do it in a way
 10:32:35 13 that would impact the least amount of people,
 10:32:37 14 because obviously our people in a management company
 10:32:40 15 are our most valuable resource.

10:32:42 16 Q. Was there any other reason that you had
 10:32:45 17 other than what you've already mentioned?

10:32:45 18 A. No. That's it.

10:32:47 19 Q. Okay. Can you explain what your role was
 10:32:50 20 in the -- in the decision to terminate Miss
 10:32:52 21 Hildebrandt?

10:32:55 22 A. We basically had been experiencing some
 10:33:01 23 very, very difficult economic times. As you're well
 10:33:05 24 aware, going into even prior September 11th the --

10:34:18 1 going on in a number of different circumstances, the
 10:34:18 2 marketplace, what our competitors were doing and the
 10:34:20 3 like.
 10:34:20 4 And Scott Miller made a suggestion, our
 10:34:23 5 president, that it was time that we go in and
 10:34:26 6 consider taking a look at not only a number of cost
 10:34:30 7 savings measures that we had already implemented
 10:34:33 8 prior to September 11th but to go to the next step
 10:34:35 9 in that area and also to take a look at some of our
 10:34:38 10 people, because it was really -- it was basically
 10:34:40 11 impossible to avoid doing that in order to -- in
 10:34:44 12 order to make some good business decisions.
 10:34:46 13 I went back, sat down with all of my
 10:34:49 14 direct reports, Jack Horne being one, Fred Shea
 10:34:52 15 being another, Rob Sarmiento being another and Steve
 10:34:57 16 Enselein being the other, and asked them to go back
 10:35:00 17 to their specific areas, take a look at their
 10:35:03 18 business from the perspective that I mentioned
 10:35:05 19 earlier with those three points in mind of trying to
 10:35:09 20 save us some money where we could, do it in a way
 10:35:12 21 that would limit the least amount of production loss
 10:35:14 22 and do it in a way that would impact the least
 10:35:16 23 amount of people.
 10:35:17 24 They all came back to me with their

10:33:09 1 the nation was in turmoil, and a lot of corporate --
 10:33:12 2 corporate business. Our competitors had gone
 10:33:14 3 through a number of potential reductions in force,
 10:33:18 4 layoffs and so forth, prior to September 11th. And
 10:33:21 5 fortunately we at Hyatt were able to avoid that,
 10:33:24 6 because we really wanted to try very hard to avoid
 10:33:27 7 something like that.

10:33:28 8 Again, as I said, before when you're a
 10:33:31 9 management company and your role is to deliver
 10:33:33 10 excellent people to manage our properties, it's
 10:33:35 11 something that is your asset. It's your number one
 10:33:37 12 asset.

10:33:38 13 When September 11th hit, within the next
 10:33:42 14 three days we lost over \$44 million worth of
 10:33:45 15 business in immediate cancellations. Our business
 10:33:48 16 dropped by, gosh, \$415 million, I believe, over the
 10:33:53 17 prior year. And -- and we were quite honestly
 10:33:57 18 forced to make some decisions that we absolutely
 10:33:59 19 hated to make, but in a people-related business
 10:34:02 20 where the majority of your costs are related to your
 10:34:05 21 folks, you have to -- have to consider those types
 10:34:08 22 of things.

10:34:18 23 We had daily meetings following
 10:34:18 24 September 11th to try to pay attention to what was

10:35:18 1 recommendations. We asked them specifically at that
 10:35:22 2 point in time to prioritize them --
 10:35:25 3 I think Jack might have actually been the
 10:35:27 4 one who came up with the, quote, A, B, C breakdown
 10:35:31 5 that I think you've seen in some of the documents
 10:35:33 6 that we have.
 10:35:34 7 -- in an effort just to ensure that if
 10:35:37 8 there was another terrorist attack or there was
 10:35:40 9 something that took place within another 30 days and
 10:35:42 10 we may have to consider doing something else that --
 10:35:46 11 that we would at least have looked at it and had
 10:35:48 12 some thought process behind it.
 10:35:51 13 I then took the recommendations of my
 10:35:54 14 folks. I took a -- the opportunity, as, again,
 10:35:58 15 you've seen in the documents, to basically summarize
 10:36:00 16 them for our president and for our chief operating
 10:36:04 17 officer and submitted them to our group. All of our
 10:36:09 18 departments, all of our hotels did basically the
 10:36:11 19 same exercise throughout that point in time.
 10:36:15 20 I can tell you that the day, I don't know
 10:36:16 21 exactly the date, but the day that we made the
 10:36:19 22 decision to have to impact our people was one of the
 10:36:23 23 toughest days that we've ever had. Scott Miller,
 10:36:26 24 who was usually one of the most outgoing and vocal

11:17:46 1 A. No. They -- and there's a representative
 11:17:48 2 that sits on this managing committee, but again, as
 11:17:53 3 I -- as I stated earlier, this was -- their
 11:17:57 4 involvement was not in specifics in this at all. It
 11:18:00 5 was very much just, you know, having us go and make
 11:18:05 6 recommendations for our own specific areas. So no,
 11:18:10 7 did we have any discussions like that, not at all.
 11:18:13 8 Q. Well, I understand you said Sara --
 11:18:16 9 A. Hays.
 11:18:16 10 Q. -- Hays was part of the managing
 11:18:18 11 committee, and I understand she's there in her
 11:18:21 12 corporate capacity --
 11:18:21 13 A. Uh-huh.
 11:18:22 14 Q. -- but I -- she was not there in the
 11:18:23 15 capacity of giving legal advice --
 11:18:26 16 A. No.
 11:18:26 17 Q. -- was she? Okay. Do you know of anyone
 11:18:29 18 else who gave legal advice about this reduction in
 11:18:32 19 force?
 11:18:33 20 A. Not to me specifically, no.
 11:18:41 21 Q. Okay. Do you know if -- if anyone gave
 11:18:42 22 legal advice to anyone else?
 11:18:45 23 A. Not on my team.
 11:18:58 24 Q. Okay. Let's see. Did Tom Pritzker play

11:20:33 1 where he was asked to go back to his individuals
 11:20:35 2 and -- within his departments and determine
 11:20:38 3 recommendations.
 11:20:47 4 Q. Didn't you feel that the national sales
 11:20:49 5 force was a strong point in the company?
 11:20:54 6 A. Absolutely.
 11:20:56 7 Q. And in the year 2001 didn't you feel that
 11:20:59 8 the national sales force had very high credibility?
 11:21:02 9 A. I always have felt that the national sales
 11:21:04 10 force has high credibility.
 11:21:26 11 Q. Were there any specific criteria developed
 11:21:28 12 to determine how many people would have to be
 11:21:31 13 terminated?
 11:21:32 14 A. No.
 11:21:34 15 Q. Were there any specific criteria developed
 11:21:39 16 to determine which individuals would have to be
 11:21:41 17 terminated?
 11:21:44 18 A. Again, to the best of my knowledge and it
 11:21:46 19 was, you know, Jack's recommendation to go through
 11:21:48 20 the process, he specifically looked at market
 11:21:53 21 segments, he looked at customer relationships in
 11:21:58 22 specific areas, he analyzed each person's individual
 11:22:04 23 account loads and so forth and came through with
 11:22:07 24 recommendations that way, as did others in their own

11:19:13 1 any role in this reduction in force?
 11:19:15 2 A. No.
 11:19:16 3 Q. Did any members of the Pritzker family
 11:19:20 4 play any role?
 11:19:21 5 A. No.
 11:19:27 6 Q. What role did Scott Miller play in this
 11:19:30 7 reduction in force?
 11:19:31 8 A. Only the role that I had mentioned before
 11:19:34 9 where we had analyzed the need to have to make some
 11:19:47 10 drastic steps within our business. He just, like
 11:19:47 11 myself, trusts his people, believes that, you know,
 11:19:49 12 we are the ones who know our departments certainly
 11:19:53 13 better than he does, asked us to go, as I asked my
 11:19:57 14 people, to take a look at our specific areas and --
 11:20:00 15 and make a business decision and make a
 11:20:01 16 recommendation based on the tragedies that had taken
 11:20:04 17 place. And -- and that was basically it.
 11:20:06 18 Q. Okay. What role did Ed Rabin play in the
 11:20:12 19 reduction in force?
 11:20:13 20 A. Very -- very little. Was -- was certainly
 11:20:18 21 involved in the meetings but none with me.
 11:20:26 22 Q. What role did Chuck Floyd play in the
 11:20:29 23 reduction in force?
 11:20:30 24 A. Chuck was in the same category as I was

11:22:12 1 areas. They looked specifically into the business
 11:22:15 2 at hand and -- and tried to make the best decisions
 11:22:17 3 that they could make.
 11:22:20 4 Q. Okay. I understand you've mentioned these
 11:22:23 5 three -- well, cost savings, trying to minimize lost
 11:22:31 6 production to the company. Was there a third one?
 11:22:34 7 A. And doing it without impact -- with
 11:22:37 8 impacting the least amount of people possible.
 11:22:39 9 Q. Impacting the least amount of people?
 11:22:42 10 A. Right. Exactly.
 11:22:45 11 Q. Was seniority a criteria that was
 11:22:49 12 considered?
 11:22:49 13 A. I personally didn't look at seniority
 11:22:52 14 myself. I felt and still do that our national sales
 11:22:58 15 office group is a very mature group. It was not
 11:23:03 16 until after the allegations came out relative to
 11:23:06 17 this that we actually went back and took a look at
 11:23:09 18 some of the demographics in those areas, again, to
 11:23:12 19 see that, you know, 52 percent of our people were
 11:23:15 20 over the age of 40 and -- and so forth. I had asked
 11:23:17 21 that my team do that and -- and take a look at it,
 11:23:21 22 because I was quite honestly shocked and surprised.
 11:23:24 23 We took a look at it from a business perspective and
 11:23:26 24 that's all that we did.

11:23:28 1 Q. Okay. You didn't consider long-term
11:23:30 2 performance as a criteria?
11:23:32 3 A. Again, I defer to Jack on that, but again,
11:23:37 4 we looked at market specific situations.
11:23:39 5 Q. You didn't consider short-term performance
11:23:43 6 as a criteria, did you?
11:23:44 7 A. Same answer as before. We looked at
11:23:47 8 market specifics and -- and conditions relative to
11:23:49 9 those customers.
11:23:50 10 Q. You didn't consider long-time
11:23:52 11 relationships with accounts, did you?
11:23:53 12 A. I -- I'm -- again going back to -- to
11:24:00 13 Jack, since we did take a look at customer
11:24:03 14 relationships and markets and accounts, that
11:24:06 15 certainly would be a criteria.
11:24:09 16 Q. Do you think that would help to minimize
11:24:11 17 lost production if you took into account long-time
11:24:17 18 relationship with accounts?
11:24:19 19 A. In -- in some cases. Again, this is not a
11:24:20 20 widget factory type of business. You have customers
11:24:24 21 that come and go. You have accounts in business
11:24:27 22 that come and go. It's a little bit more
11:24:30 23 complicated in my eyes than just saying that because
11:24:33 24 somebody happens to have a long-term relationship

11:25:43 1 costs at Hyatt's request to move to a location?
11:25:47 2 MS. GALLION: Same objection. Objection
11:25:48 3 to the form of the question, asking if he
11:25:49 4 himself.
11:25:50 5 But you may answer.
11:25:51 6 Q. Yes, I'm asking you yourself.
11:25:53 7 A. Personally I did not take a look at that.
11:25:55 8 Q. Did you take into consideration the cost
11:25:59 9 of satellite offices which are known as SOHOS?
11:26:05 10 A. I did not personally take that into
11:26:08 11 consideration although I know that Jack did take a
11:26:11 12 look at that in some instances.
11:26:18 13 Q. Okay. Did Jack tell you that the cost of
11:26:20 14 a SOHO was a reason for terminating anybody?
11:26:22 15 A. There were some savings in some certain
11:26:28 16 satellite locations, not necessarily so much home
11:26:30 17 offices but in locations where we had potentially
11:26:34 18 rent payments and things like that to specific
11:26:36 19 hotels or in some areas where we potentially
11:26:40 20 anticipated that, based on the economy, we would
11:26:42 21 have had to deal with some additional expenses.
11:26:49 22 Q. Okay. Do you think you can identify those
11:26:50 23 when you see the documents?
11:26:57 24 A. No.

11:24:35 1 with someone that it's going to mean that we're
11:24:37 2 going to get the most business necessarily out of
11:24:39 3 it. Again, you have to analyze a lot of different
11:24:44 4 components to the market segments themselves and
11:24:47 5 their overall value to the company.
11:24:48 6 Q. Do you think that an employee's long-term
11:24:52 7 relationship with a major account is something that
11:24:55 8 should be taken into consideration in this reduction
11:24:58 9 in force?
11:24:59 10 A. Again, it is specifically a situation of
11:25:02 11 the existing circumstances about those accounts and
11:25:06 12 about those market segments and the geography in
11:25:10 13 some cases of -- of where those are -- where those
11:25:13 14 are located. Yes, I would hope that all of those
11:25:16 15 things were taken into consideration.
11:25:20 16 Q. Did you take into account the amount Hyatt
11:25:22 17 spent on schooling and training any of the people
11:25:25 18 that were terminated?
11:25:26 19 MS. GALLION: Object to the form of the
11:25:27 20 question. Assumes that he made the decisions.
11:25:30 21 Subject to that, you can answer.
11:25:32 22 A. No.
11:25:37 23 Q. Did you take into account whether any of
11:25:40 24 these people terminated had paid their own moving

11:27:02 1 Q. Did -- did you take into account any of
11:27:03 2 the employees' awards and achievements in deciding
11:27:07 3 who to terminate?
11:27:08 4 A. No.
11:27:08 5 Q. Did you take into account their annual
11:27:11 6 performance reviews?
11:27:13 7 A. No.
11:27:13 8 Q. Did you take into account an employee's
11:27:16 9 long-term loyalty to the company versus employees
11:27:20 10 who may have quit the company and come back?
11:27:24 11 A. We have a lot of long-term employees that
11:27:27 12 have great loyalty to us. It was a -- it was a
11:27:28 13 business decision. No.
11:27:32 14 Q. Did you consider problems you might have
11:27:35 15 in accommodating an employee's disability when
11:27:37 16 making a decision to terminate any of these
11:27:41 17 employees?
11:27:41 18 A. No.
11:27:45 19 Q. Did you give any consideration to the
11:27:46 20 effect a termination might have on an employee's
11:27:52 21 long-term savings and the tax consequences to them?
11:27:56 22 A. Not specifically. I mean, of course you
11:27:58 23 think about that with everybody. I mean, everybody
11:28:00 24 has -- has issues. But again, to say that we looked

12:02:38 1 wouldn't say that I positioned people. I don't
 12:02:40 2 think that's an appropriate word. I don't know
 12:02:42 3 what --
 12:02:43 4 Q. Is that a word that you use or don't use?
 12:02:45 5 A. No, I don't use it, no.
 6 (Plaintiff's Exhibit
 7 31a was referenced.)
 12:02:58 8 Q. Show you Exhibit Number 31a.
 12:03:04 9 A. Okay.
 12:03:05 10 MS. GALLION: Thank you.
 12:03:12 11 Q. Do you recognize this as your review of
 12:03:14 12 Jack Horne?
 12:03:14 13 A. Yeah, from a couple of years ago, yes.
 12:03:17 14 Q. Okay. Well, this was for the 2000, right?
 12:03:20 15 A. Okay. Yeah.
 12:03:21 16 Q. Do you -- can you see that in --
 12:03:22 17 A. Yes.
 12:03:22 18 Q. -- the second paragraph?
 12:03:23 19 A. Yeah, I sure can. Right.
 12:03:25 20 Q. Okay. Would you look at the third
 12:03:27 21 paragraph from the bottom.
 12:03:28 22 A. I -- I see.
 12:03:29 23 Q. Could you read that into the record.
 12:03:31 24 A. I would be happy to: Throughout 2001 we

12:04:43 1 mind to replace you as -- as your -- in your
 12:04:49 2 succession planning?
 12:04:50 3 A. Not -- not exactly. As a matter of fact,
 12:04:51 4 I had offered it to another individual first who
 12:04:53 5 turned me down.
 12:04:55 6 Q. And who was that?
 12:04:56 7 A. Terri Benich, who was our director of
 12:04:58 8 marketing out in Scottsdale. Rationale behind that,
 12:05:01 9 we were looking for somebody that had primarily
 12:05:06 10 international experience but also multiple hotel
 12:05:10 11 experience. Terri's hotel has done the best job of
 12:05:13 12 any of our hotels on international business. She
 12:05:19 13 unfortunately did not want to accept the position or
 12:05:22 14 move to Chicago. She was in the process at the time
 12:05:26 15 of adopting a baby from Russia and it was just not
 12:05:32 16 good timing from that perspective. But she did --
 12:05:35 17 she did turn me down unfortunately, because I think
 12:05:39 18 she would have done an excellent job.
 12:05:42 19 My next course of action was to, again,
 12:05:44 20 take a look at the potential people that were out
 12:05:50 21 there. Rob having worked in the southern division
 12:05:54 22 and being responsible for some 27 hotels, also being
 12:06:00 23 of Cuban descent, speaking Spanish fluently, growing
 12:06:04 24 up in Mexico City and having an understanding of

12:03:34 1 will be positioning Jack Horne for a promotion as
 12:03:37 2 vice president.
 12:03:38 3 Q. And the rest of it, please.
 12:03:39 4 A. "During that time it will be critical to
 12:03:42 5 give Jack extra exposure internally to allow him the
 12:03:46 6 opportunity to show what he can bring to the
 12:03:48 7 company."
 12:03:49 8 Q. Okay. And then did you make an effort to
 12:03:51 9 give Mr. Horne extra exposure so that he would be in
 12:03:57 10 the best position to get this promotion?
 12:03:58 11 A. When opportunities existed. He has not
 12:04:01 12 gotten that promotion, by the way.
 12:04:03 13 Q. But you've given him the exposure to get
 12:04:05 14 it, haven't you?
 12:04:07 15 A. I -- I -- certainly.
 12:04:14 16 Q. Okay. When did you -- well, didn't you
 12:04:15 17 also position Rob Sarmiento to be promoted to his
 12:04:19 18 current position?
 12:04:20 19 A. I didn't position Rob Sarmiento. The --
 12:04:25 20 Rob took my place. I was in Rob's job before moving
 12:04:29 21 into my current role, and so Rob was, again, a hire
 12:04:37 22 of mine into that position that I had just recently
 12:04:41 23 vacated.
 12:04:44 24 Q. Well, isn't he the person that you had in

12:06:07 1 the -- of the marketplace that we were actually
 12:06:09 2 trying to attract on the international side, was
 12:06:11 3 important to me. And I also thought that through
 12:06:14 4 his experience he brought a -- a sense of a separate
 12:06:17 5 set of eyes to the position, very similar to what I
 12:06:22 6 had done when I was in the position coming from a
 12:06:25 7 divisional director of sales.
 12:06:28 8 Q. When did you offer this position to Terri
 12:06:31 9 Benich?
 12:06:33 10 A. Again, I don't remember the specific
 12:06:34 11 dates, but it was -- it was before Rob.
 12:06:38 12 Q. How did you make the offer? Was it oral?
 12:06:41 13 A. It was oral. I contacted her over the
 12:06:44 14 phone.
 12:06:44 15 Q. And you said you knew she had just adopted
 12:06:46 16 a baby.
 12:06:47 17 A. Not until I had talked to her. She -- she
 12:06:49 18 very seriously considered it. She thought that
 12:06:52 19 there were some opportunities. If there were any
 12:06:54 20 place that she could have worked it out, it would
 12:06:57 21 have been either Chicago or Scottsdale where she's
 12:06:59 22 at. She has family in the Chicago area, thought
 12:07:01 23 that that might be able to work from a, you know,
 12:07:05 24 coverage perspective for the -- for the child, but

12:20:10 1 percentage of where it is and then measure where you
 12:20:13 2 are today one year later and see for two years out
 12:20:17 3 how --
 12:20:18 4 Q. Okay.
 12:20:19 5 A. -- how -- how the business works.
 12:20:21 6 Q. Could you look at item 3.
 12:20:22 7 A. Sure.
 12:20:23 8 Q. This says National Sales Production.
 12:20:25 9 A. Uh-huh.
 12:20:27 10 Q. And can you just read that into the
 12:20:27 11 record.
 12:20:27 12 A. The national sales force or The NSF
 12:20:31 13 produced \$481 million in 2000, which exceeded quota
 12:20:36 14 by 59 million and 1999 by 104 million.
 12:20:55 15 Q. What does the -- the reference to 1999
 12:20:55 16 mean?
 12:20:55 17 A. That year's production.
 12:20:55 18 Q. So in '99 and 2000 they significantly
 12:20:58 19 exceeded their quota?
 12:21:00 20 A. No, what we're -- what we're saying is
 12:21:01 21 they produced \$481 million in 2000. It exceeded
 12:21:05 22 their quota by 59 million. It exceeded the previous
 12:21:10 23 year's number by 104.
 12:21:14 24 Q. Okay.

12:21:14 1 A. Okay?
 12:21:15 2 Q. Then could you look at item number 4.
 12:21:17 3 A. Yes.
 12:21:18 4 Q. Field Sales Production.
 12:21:22 5 A. Uh-huh.
 12:21:22 6 Q. What is field sales production?
 12:21:23 7 A. Those are the business that are produced
 12:21:26 8 in our hotels by the sales force that are located in
 12:21:32 9 our hotels.
 12:21:33 10 Q. Okay. What's the difference between the
 12:21:36 11 field sales force and the national sales force?
 12:21:39 12 A. Each individual hotel has anywhere from 2
 12:21:44 13 to 15, 20, depending upon the size of hotel,
 12:21:48 14 salespeople that are responsible for generating
 12:21:50 15 business for that hotel. They are specifically paid
 12:21:54 16 for by the owner of that hotel and work solely for
 12:21:57 17 that hotel.
 12:21:59 18 Again, each one of those has a specific
 12:22:02 19 quota that they're responsible for. The national
 12:22:06 20 sales office is what we consider to be our
 12:22:09 21 supplemental force that works national accounts,
 12:22:11 22 that have multiple Hyatt opportunities to try to,
 12:22:16 23 again, infuse additional business into the hotels
 12:22:19 24 above and beyond what their local sales effort would

12:22:22 1 be. It usually represents, Bob, about 40 percent of
 12:22:26 2 our business, the national sales office does. Some
 12:22:29 3 years it's 37, some years it's 42, but in general
 12:22:32 4 it's about -- it -- it's about 40 percent.
 12:22:35 5 Q. Is there a difference in the type of
 12:22:38 6 accounts, the national and field sales?
 12:22:40 7 A. Absolutely. Again, a national account
 12:22:45 8 needs to be one that has multiple Hyatt
 12:22:47 9 opportunities. It -- it needs to be the -- the --
 12:22:51 10 the type of account that, again, has additional
 12:22:55 11 potential that we could -- we could garner. More of
 12:22:59 12 a local account base is something that, you know,
 12:23:02 13 might specifically service a -- a specific regional
 12:23:06 14 area.
 12:23:07 15 Q. What do you mean by multiple Hyatt
 12:23:09 16 opportunities?
 12:23:10 17 A. That the account wouldn't just work for
 12:23:13 18 one specific location, that it would have the
 12:23:15 19 ability to impact a number of our hotels.
 12:23:19 20 Q. Okay. Does it have anything to do with
 12:23:23 21 more than one event?
 12:23:26 22 A. Certainly. Nothing -- there's no specific
 12:23:30 23 rationale that it has to have a certain amount of
 12:23:32 24 events or, you know, things along those lines, but

12:24:44 1 structure works relative to that relationship is we
 12:24:49 2 focus initially on the hotels to start with and we
 12:24:52 3 create what we call future group revenue targets.
 12:24:55 4 And those targets are determined by the hotels as to
 12:24:59 5 what they need to achieve in the current year, the
 12:25:03 6 next year and the year after, relative to their
 12:25:05 7 group and convention business. We then take that,
 12:25:09 8 roll it up and find out what an overall companywide
 12:25:13 9 number is that we certainly need to book in order to
 12:25:15 10 be -- in order to get the hotels to the goals that
 12:25:18 11 they need to achieve.

12:25:20 12 Q. Is the -- is the future group revenue
 12:25:24 13 target is another name for that quota or is that
 12:25:27 14 different?

12:25:28 15 A. No, that's different. The future group
 12:25:30 16 revenue targets are -- are the target that a hotel
 12:25:33 17 general manager feels he or she needs to have in
 12:25:35 18 their hotel in order to be successful in future
 12:25:37 19 years. So in other words, you may take the revenue
 12:25:39 20 that you have for this year, feel that in order to
 12:25:42 21 continue to make debt service on the hotel and so
 12:25:45 22 forth, that you need to grow your group business by
 12:25:48 23 5 percent or 4 percent or 6 percent next year.
 12:25:50 24 Maybe the following year it's only 3 or 4 percent.

12:26:55 1 A. Of that total of -- of rolled-up future
 12:26:58 2 group revenue target for all of our hotels. Let's
 12:27:02 3 use Chicago as an example. Let's say that year over
 12:27:05 4 year we need to generate an additional \$10 million
 12:27:08 5 in group business in order to be successful from
 12:27:12 6 where we are at this hotel. That would get
 12:27:14 7 aggregated up to all of our hotels throughout the --
 12:27:18 8 throughout the company, and let's say for
 12:27:20 9 hypothetical numbers for easy math that that's
 12:27:23 10 \$100 million.

12:27:23 11 Q. So you'd have to start with the total
 12:27:26 12 group revenue target for all the hotels?
 12:27:28 13 A. Correct.
 12:27:29 14 Q. Okay.

12:27:29 15 A. Correct. You have \$100 million. Then we
 12:27:31 16 will take the model of our past practices where
 12:27:34 17 we've seen that the national sales office
 12:27:36 18 represents, again, about 40 percent of that total.
 12:27:39 19 In this case then, if it were \$100 million,
 12:27:41 20 \$40 million of it would be allocated toward the
 12:27:44 21 national sales office to generate for the total of
 12:27:46 22 our hotels. The remaining 60 million would be the
 12:27:51 23 responsibility of the field sales. And from that,
 12:27:54 24 that's where the analysis goes in to determine

12:25:53 1 It depends a lot on some of the local dynamics, but
 12:25:56 2 it becomes a rolled-up number that we -- we focus in
 12:25:58 3 on. It is how quotas are eventually established,
 12:26:03 4 though.

12:26:04 5 Q. Okay. Were you involved in -- in the
 12:26:06 6 future group revenue targets in your job now?

12:26:09 7 A. The -- Fred Shea actually handles them
 12:26:12 8 specifically and works with our divisional directors
 12:26:15 9 of sales to roll them up. I see the end number when
 12:26:18 10 it's all done.

12:26:19 11 Q. Okay. How about for the national sales
 12:26:21 12 force, do they have a future group revenue target?

12:26:24 13 A. Well, what -- what -- what happens is is
 12:26:34 14 once we roll up this large company number of what we
 12:26:34 15 need to accomplish in all of our hotels in order to
 12:26:34 16 be successful, we then go back in and apply the
 12:26:35 17 model that I discussed earlier of the rough
 12:26:37 18 percentages that we've seen historically out of
 12:26:40 19 accounts that make sense. So in other words, we'll
 12:26:43 20 take 40 percent, because again it could be 42 one
 12:26:46 21 year or 37 the next, but in general we found that
 12:26:49 22 40 percent is a relatively good number for our
 12:26:52 23 national business to infuse into this total.

12:26:54 24 Q. 40 percent of what?

12:27:37 1 quotas.

12:27:58 2 Q. Okay. Thank you. Now, going back to this
 12:28:01 3 item number 4 --

12:28:02 4 A. Uh-huh.

12:28:02 5 Q. -- Field Sales Production, the field sales
 12:28:06 6 were under their quota in 2000, right?

12:28:09 7 A. Correct.

12:28:10 8 Q. Slightly?

12:28:10 9 A. Correct.

12:28:14 10 Q. Now, could you look at number 5, Human
 12:28:16 11 Resources.

12:28:17 12 A. Uh-huh.

12:28:18 13 Q. This is saying that there were three new
 12:28:22 14 assistant vice presidents?

12:28:24 15 A. Correct.

12:28:27 16 Q. Were you involved in the hiring or
 12:28:29 17 promotion of any of these three?

12:28:32 18 A. Was not for Jack Horne. That was done
 12:28:34 19 before I came into the role. So he was one but he,
 12:28:37 20 again, was very new. He had been in the position
 12:28:40 21 just a few months when I took over.

12:28:42 22 Q. Okay.

12:28:43 23 A. Rob Sarmiento was the other one, who we
 12:28:45 24 have discussed earlier. And Steve Enselein was

14:22:37 1 Q. Okay. What is this?
 14:22:38 2 A. This was the summary page that I spoke to
 14:22:41 3 earlier that I used to put, so to speak, on top of
 14:22:44 4 the recommendations that my people had made in all
 14:22:51 5 their various areas.
 14:22:54 6 Q. All right. Now, this -- this one is for
 14:22:58 7 corporate sales?
 14:22:59 8 A. Correct.
 14:23:01 9 Q. Okay. Did you have separate memos for
 14:23:04 10 other departments that you gave to Mr. Miller?
 14:23:08 11 A. No. No. When you say other departments,
 14:23:11 12 can you clarify?
 14:23:12 13 Q. Okay. Were -- were there -- I -- I
 14:23:15 14 thought that you gave me a list of other department
 14:23:18 15 heads that you asked to make recommendations on
 14:23:20 16 terminations.
 14:23:22 17 A. Correct.
 14:23:23 18 Q. Do you remember those people?
 14:23:23 19 A. Correct.
 14:23:23 20 Q. Okay.
 14:23:25 21 A. And they -- when you get to the next piece
 14:23:28 22 you'll see that they're broken down by each one of
 14:23:31 23 those people.
 14:23:32 24 Q. Okay. They're all included in this?

14:23:34 1 A. Yes.
 14:23:35 2 Q. Okay.
 14:23:35 3 A. Yes.
 14:23:36 4 Q. Okay. Did every department head rank each
 14:23:51 5 position A, B or C?
 14:23:53 6 A. No. As I mentioned earlier, I believe it
 14:23:56 7 was Jack's idea to try to prioritize it that way.
 14:24:01 8 Again, we were concerned that if there happened to
 14:24:03 9 be another tragedy that would take place or
 14:24:06 10 something that would -- would happen along those
 14:24:09 11 lines, that we had at least gone through and taken a
 14:24:11 12 look at what a possible next step would be if we
 14:24:14 13 needed to go that route.
 14:24:16 14 Q. Okay. That's, I guess, what's confusing
 14:24:18 15 me, because the second sentence here says you rank
 14:24:22 16 each position A, B or C.
 14:24:24 17 A. Correct.
 14:24:25 18 Q. And -- or I thought you told me that you
 14:24:29 19 included more than just Mr. Horne's recommendations
 14:24:32 20 here.
 14:24:33 21 A. We -- we did. Again, in the morning
 14:24:34 22 meeting after the fact Jack said at that point, hey,
 14:24:38 23 guys, why don't we try to do this as A, Bs and Cs.
 14:24:50 24 That would make some sense. We all thought that

14:24:50 1 made -- made good sense and that's how the rest of
 14:24:50 2 the group did it as well.
 14:24:50 3 Q. Okay. Okay. Now, it says: A positions
 14:24:53 4 are critical to the core of our operations.
 14:24:57 5 A. Uh-huh.
 14:24:58 6 Q. Right? Who made that determination?
 14:25:00 7 A. Each one of my department heads made that
 14:25:03 8 determination.
 14:25:05 9 Q. Okay. Were there any criteria provided to
 14:25:12 10 them to make this determination?
 14:25:15 11 A. Beyond what I had mentioned to you before
 14:25:16 12 about the three things of taking care of an
 14:25:20 13 opportunity to do this to the least amount of
 14:25:21 14 people, to save revenue where we could and to cut
 14:25:25 15 some expenses where we could, no.
 14:25:34 16 Q. Okay. Then it says: The C cuts represent
 14:25:36 17 an annual -- an overall annual labor savings of
 14:25:40 18 1.3 million plus PTEB.
 14:25:44 19 A. Uh-huh.
 14:25:44 20 Q. Who -- who made that computation?
 14:25:46 21 A. I did.
 14:25:47 22 Q. Okay. What was the significance of
 14:25:55 23 1.3 million?
 14:25:55 24 A. I just added up what the recommendations
 14:25:57 1 were from all of my people and was just reporting
 14:26:00 2 it. This, again, was a summary of what was included
 14:26:03 3 in the attached documents.
 14:26:04 4 Q. Was there any requirement that you make a
 14:26:10 5 savings of 1.3 million?
 14:26:12 6 A. No. No.
 14:26:14 7 Q. Could you have come back with a savings of
 14:26:18 8 zero?
 14:26:18 9 A. I -- I doubt it, only because of the
 14:26:22 10 circumstances at the time. We were -- like I said,
 14:26:29 11 we had just lost millions and millions of dollars.
 14:26:31 12 We needed to make a business decision. I -- I don't
 14:26:34 13 believe that -- I don't believe that that would have
 14:26:36 14 been accepted. It was a tough thing to do, I've
 14:26:38 15 said that before, but we had to make some tough
 14:26:41 16 decisions.
 14:26:41 17 Q. Could you have come back with a savings of
 14:26:43 18 less than 1.3 million?
 14:26:46 19 A. I -- I don't know. I didn't, so I don't
 14:26:48 20 know if I could or couldn't.
 14:26:51 21 Q. Well, you had options, didn't you?
 14:26:54 22 A. I made my recommendation based on what I
 14:26:56 23 felt was the right thing to do, geared toward what
 14:27:00 24 my people had -- had suggested. I empowered them,

16:13:18 1 that -- at corporate that I was talking about
 16:13:20 2 before. So my group of five direct reports and the
 16:13:23 3 people that are underneath them.
 16:13:25 4 Q. Would that include Mrs. Hildebrandt?
 16:13:27 5 A. It would have included the folks in the
 16:13:30 6 Chicago area, not necessarily in the national sales
 16:13:32 7 office, but our corporate -- we call it the sales
 16:13:36 8 administration area. So it's -- it doesn't relate
 16:13:39 9 to the national sales office, no.
 16:13:41 10 Q. Does it include some directors of
 16:13:43 11 national sales?
 16:13:43 12 A. No.
 16:13:44 13 Q. Okay. Scott Miller, do you have any
 16:13:49 14 social relationship with Mr. Miller?
 16:13:51 15 A. No.
 16:13:52 16 Q. Did he come on in about '99?
 16:13:55 17 A. He actually came on at the beginning --
 16:14:00 18 January of 2000.
 16:14:01 19 Q. January 2000?
 16:14:02 20 A. Yeah.
 16:14:03 21 Q. Okay. Had he ever worked in the hotel
 16:14:05 22 industry?
 16:14:05 23 A. He was the president of our Hyatt
 16:14:08 24 development corporation before that for probably two

16:15:11 1 function at his house.
 16:15:14 2 Q. Okay. Do you have any social relationship
 16:15:16 3 or had one with Mr. Sarmiento?
 16:15:18 4 A. No.
 16:15:21 5 Q. Okay. Now, you're -- are you aware that
 16:15:25 6 Mrs. Hildebrandt expressed an interest in the
 16:15:28 7 position that was given to Mr. Sarmiento?
 16:15:31 8 A. I had forgotten that she had done that
 16:15:33 9 until I was just recently reminded that that was the
 16:15:37 10 case.
 16:15:37 11 Q. Who reminded you?
 16:15:39 12 A. Theresa.
 16:15:41 13 Q. Okay. Do you remember it?
 16:15:42 14 A. I really don't.
 16:15:45 15 Q. Okay.
 16:15:45 16 A. I really don't.
 16:15:46 17 Q. Do you remember that she was told by Bruce
 16:15:51 18 Small to call Mr. Cheatham and that after that you
 16:15:55 19 called her --
 16:15:56 20 A. Okay.
 16:15:56 21 Q. -- and spoke to her about this?
 16:15:58 22 A. I -- again, I don't -- I don't
 16:16:00 23 specifically recall it. I don't.
 16:16:03 24 Q. Okay.

Page 237

16:14:14 1 years. And before that was responsible for a -- a
 16:14:18 2 number of companies on the real estate and
 16:14:20 3 development side. Some may have been involved with
 16:14:23 4 hotels, I don't know.
 16:14:25 5 Q. Didn't he come from the Bechtel company?
 16:14:28 6 A. He was with them at one point. He had his
 16:14:30 7 own company, John Buck corporation here in Chicago,
 16:14:34 8 and then there were a number of companies he's been
 16:14:36 9 involved with.
 16:14:37 10 Q. Do you have any type of social
 16:14:39 11 relationship with Mr. Rabin?
 16:14:40 12 A. No.
 16:14:41 13 Q. Do you have a social relationship with
 16:14:43 14 Mr. Floyd?
 16:14:44 15 A. No, really don't. You know, nothing
 16:14:47 16 beyond, again, the same thing: played golf with him
 16:14:50 17 a few times, have been to his house for the same
 16:14:55 18 event that I had at my house when I was -- when I
 16:14:56 19 worked for him, so...
 16:14:59 20 Q. Okay. I'm not sure what you mean by that.
 16:15:02 21 A. When I said before that I had had people
 16:15:03 22 out to my house who were in our sales administration
 16:15:06 23 area as the -- as the head of the department, when
 16:15:09 24 he was the head of the department, I attended his

Page 239

16:16:03 1 A. Not saying it didn't happen.
 16:16:05 2 Q. Oh.
 16:16:05 3 A. But I just don't --
 16:16:05 4 Q. Let me just ask --
 16:16:05 5 A. -- specifically remember.
 16:16:06 6 Q. -- you another question about it to see if
 16:16:09 7 it'll help --
 16:16:10 8 A. Sure.
 16:16:10 9 Q. -- your recollection.
 16:16:11 10 A. Yeah.
 16:16:11 11 Q. Do you remember telling her that
 16:16:13 12 Mr. Sarmiento had already been selected for this
 16:16:16 13 position --
 16:16:18 14 A. I don't --
 16:16:19 15 Q. -- and thanked her for her interest?
 16:16:21 16 A. I -- I may have. Again, I don't remember
 16:16:23 17 what time specifically it had taken place in the
 16:16:25 18 process of trying to fill that position.
 16:16:32 19 Q. Okay. So you --
 16:16:33 20 A. Like I said before, I reached out to Terri
 16:16:36 21 Benich first, who was the first person on my list
 16:16:39 22 for that position. Then I reached out to -- to Rob.
 16:16:43 23 Q. All right. Well, what I want to find out
 16:16:44 24 is your -- your actual recollection --

16:16:46 1 A. Yeah.
 16:16:46 2 Q. -- as opposed anything Ms. Gallion might
 16:16:53 3 have told you.
 16:16:54 4 A. Right.
 16:16:54 5 Q. Okay?
 16:16:54 6 A. Right.
 16:16:54 7 Q. Do you have any recollection at all of
 16:16:55 8 Mrs. Hildebrandt expressing an interest in that job?
 16:16:57 9 A. After she reminded me, yes, I did remember
 16:17:00 10 that we had had a conversation.
 16:17:03 11 Q. Okay.
 16:17:03 12 A. Yeah.
 16:17:03 13 Q. So you knew she was interested in
 16:17:05 14 advancement?
 16:17:05 15 A. Correct.
 16:17:05 16 Q. All right.
 16:17:05 17 A. Absolutely.
 16:17:06 18 Q. Do you also remember that Loretta Venezia
 16:17:10 19 approached you about that position?
 16:17:11 20 A. Yes, I do.
 16:17:13 21 Q. Okay. She went to see you personally
 16:17:15 22 about it?
 16:17:15 23 A. Yes, I do.
 16:17:17 24 Q. And do you remember telling her that you

16:18:16 1 A. I -- I don't. I just remember that it
 16:18:18 2 did.
 16:18:18 3 Q. Do you remember it was last year?
 16:18:21 4 A. I thought it was back farther than that.
 16:18:24 5 I thought it would have been in 2000 at some point.
 16:18:27 6 Again, I -- I don't -- I don't recall specifically.
 16:18:34 7 Q. Okay. Do you -- are you aware that she
 16:18:36 8 turned in her resignation the day that everyone was
 16:18:39 9 being terminated?
 16:18:40 10 A. Yes, I did -- I did -- was aware of that.
 16:18:42 11 Q. Do you know why she turned in her
 16:18:45 12 resignation?
 16:18:45 13 A. I knew that she had found an opportunity
 16:18:46 14 to go to work for Westin in the New York area.
 16:18:51 15 Q. Do you know why she was looking for
 16:18:53 16 another job?
 16:18:54 17 A. No, I don't.
 16:18:54 18 Q. Okay. Have you had any social
 16:19:07 19 relationship with Brian Booth?
 16:19:08 20 A. No.
 16:19:11 21 Q. Do you have any social relationship with
 16:19:13 22 Mark Henry?
 16:19:13 23 A. No.
 16:19:13 24 Q. Did you have anything to do with

16:17:19 1 had already positioned Mr. Sarmiento for that
 16:17:22 2 position?
 16:17:22 3 A. I don't remember that part of the
 16:17:24 4 conversation, no. I do remember talking to her
 16:17:27 5 about what I thought the qualifications of the job
 16:17:30 6 entailed.
 16:17:31 7 Q. Do you remember laughing at her during
 16:17:33 8 that conversation?
 16:17:34 9 A. I do not, at all. Not at all.
 16:17:39 10 Q. Okay. Do you remember that shortly after
 16:17:40 11 that she asked to meet with you and Mr. Horne about
 16:17:45 12 whether she had any opportunities for advancement in
 16:17:48 13 the company?
 16:17:50 14 A. I remember that we had a meeting. I don't
 16:17:52 15 know if that was the premise to -- for it or not.
 16:17:57 16 Q. Do you remember you and Mr. Horne meeting
 16:18:01 17 with Ms. Venezia?
 16:18:13 18 A. Yes.
 16:18:13 19 Q. Okay. And do you remember that you and
 16:18:13 20 Mr. Horne made it clear to her that she did not have
 16:18:13 21 an opportunity for advancement?
 16:18:13 22 A. I do not remember that, not at all.
 16:18:14 23 Q. Do you remember when that meeting took
 16:18:16 24 place?

16:19:22 1 Mr. Henry's promotion into his current position?
 16:19:25 2 A. The only comment that I can say to that is
 16:19:30 3 Mark had come to me and had said that he was
 16:19:33 4 interested in trying to take on some more
 16:19:36 5 responsibility at some point. I think he was, if I
 16:19:40 6 remember correctly, interested in moving into one of
 16:19:44 7 the director's jobs, and my suggestion was is that
 16:19:47 8 he needed to get some more management experience in
 16:19:49 9 order to consider taking on a role like that.
 16:19:51 10 Again, it was -- it was Jack's decision on
 16:19:53 11 who we hired and moved into those positions. Upon
 16:19:58 12 Mark meeting with me, I did obviously make a
 16:20:00 13 recommendation that he should certainly go for it
 16:20:02 14 and try -- try to -- you know, not that that
 16:20:05 15 position was open at that time, but if an
 16:20:06 16 opportunity came about, he should certainly try
 16:20:09 17 to --
 16:20:09 18 Q. Well, there wasn't any such position, was
 16:20:11 19 there?
 16:20:11 20 A. Correct. Correct.
 16:20:12 21 Q. This position was created for him?
 16:20:14 22 A. I wouldn't say it was created for him.
 16:20:16 23 Q. Who was it created for?
 16:20:17 24 A. It was created to help us manage our

16:20:20 1 office.

16:20:22 2 Q. Okay. And he was given the position so he
16:20:24 3 could get management experience in order to advance?

16:20:26 4 A. That seemed -- that's correct.

16:20:31 5 Q. Did you consider anybody else for that
16:20:33 6 position?

16:20:34 7 A. I didn't hire the position, so no, I
16:20:36 8 didn't consider anybody else.

16:20:37 9 Q. Was this position filled before or after
16:20:42 10 Mr. Sarmiento's position?

16:20:44 11 A. I -- I don't -- I don't recall.

16:20:50 12 Q. Okay. Was it around the same time period?

16:20:58 13 A. I -- I don't recall.

16:21:02 14 Q. Okay. Did -- did you play any role at all
16:21:04 15 in the hiring of Jennifer Roman?

16:21:07 16 A. No.

16:21:07 17 Q. Mr. Horne doesn't need your approval to
16:21:13 18 make those decisions?

16:21:14 19 A. No.

16:21:15 20 Q. Okay. Did you play any role at all in --
16:21:18 21 in the transfer of Molly Crompton?

16:21:21 22 A. No.

16:21:22 23 Q. Do you have any information about any
16:21:25 24 complaints that she's made concerning Hyatt

16:22:36 1 Omaha?

16:22:37 2 A. No. I believe it was based on her account
16:22:39 3 knowledge in the area, but that's --

16:22:44 4 Q. Do you know whether Molly Crompton handles
16:22:57 5 accounts that are in Dallas?

16:22:58 6 A. No.

16:22:59 7 Q. Do you know why Miss Murphy was allowed to
16:23:03 8 open an office in Baltimore even though her accounts
16:23:06 9 are in Philadelphia?

16:23:08 10 A. Nope.

16:23:09 11 Q. Did you know that Mary Rocereto had two
16:23:17 12 accounts in Ohio?

16:23:19 13 A. Nope.

16:23:26 14 Q. We talked before about the -- the owners
16:23:31 15 saving money on these terminations.

16:23:33 16 A. Uh-huh.

16:23:34 17 Q. Was it the owners or Hyatt that paid the
16:23:36 18 unemployment insurance on the people who were
16:23:39 19 terminated, if you know?

16:23:40 20 A. I don't know.

16:23:41 21 Q. Okay. Do you know if it was the owners or
16:23:46 22 Hyatt who paid the severances on the people who were
16:23:48 23 terminated?

16:23:50 24 A. I -- I don't know for sure. I would

16:21:28 1 officials?

16:21:28 2 A. No.

16:21:29 3 Q. Okay. Who is Vendo Toming?

16:21:41 4 A. He's our divisional director of sales for
16:21:43 5 the Victor Lopez division.

16:21:47 6 Q. Okay. Do you have any supervisory chain
16:21:50 7 with this individual?

16:21:52 8 A. Through Fred Shea, yes.

16:21:54 9 Q. Okay. Is -- is -- is he the person that
16:22:01 10 is allowed an exception to the -- the rule of
16:22:04 11 working in the same geographic area as his vice
16:22:07 12 president?

16:22:07 13 A. Yes, he's the one.

16:22:09 14 Q. Okay. Where has he been allowed to work?

16:22:12 15 A. He's based in Dallas and his divisional
16:22:14 16 vice president is based in Miami.

16:22:17 17 Q. And this is for his personal convenience?

16:22:18 18 A. I -- I would assume so. It's been that
16:22:19 19 way since I've been with Hyatt.

16:22:24 20 Q. What's been that way?

16:22:25 21 A. That he's been separated in that same
16:22:28 22 capacity.

16:22:30 23 Q. Do you know why Jennifer Roman was allowed
16:22:33 24 to work in Atlanta even though she was assigned to

16:23:52 1 assume it was Hyatt.

16:23:53 2 Q. Okay. Do you know of any positions that
16:24:01 3 were available on or about October 1st or would be
16:24:08 4 available after October 1st that terminated people
16:24:16 5 could have been placed in?

16:24:18 6 A. Beyond the Dearborn situation and the
16:24:21 7 Atlanta situation, no.

16:24:23 8 Q. Okay. What's the Atlanta situation?

16:24:25 9 A. We just had a resignation there. Gary
16:24:27 10 Schneeberg, one of our national sales managers, left
16:24:31 11 us to go to work for Six Continents down there in
16:24:35 12 Atlanta.

16:24:37 13 Q. Okay. Are you aware of the -- the opening
16:24:39 14 at the Huntington Beach resort?

16:24:41 15 A. It's -- yeah, it's a -- it's a field hotel
16:24:45 16 sales job, yes.

16:24:47 17 Q. Well, these people who were terminated
16:25:00 18 from the national sales force certainly would have
16:25:00 19 qualified for that job?

16:25:00 20 A. I thought when you were saying it before
16:25:00 21 you were talking about corporate-related
16:25:00 22 positions --

16:25:00 23 Q. Okay.

16:25:00 24 A. -- not field positions. I mean, again, we